IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

La Unión del Pueblo Entero, et al.,	§		
	§		
Plaintiffs,	§		
	§		
V.	§		
	§	Case No. 5:21-cv-00844-XR	
STATE OF TEXAS, et al.,	§	[Lead Case]	
	§	-	
Defendants.	§		
·	§		
HARRIS COUNTY REPUBLICAN PARTY, et al.,	§		
, ,	Š		
Intervenor-Defendants.	§		

LUPE PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE TO MOVE TO COMPEL PRODUCTION OF DOCUMENTS

LUPE Plaintiffs respectfully request an extension, to June 20, 2023, of their deadline to file a motion to compel the production of documents pertaining to the Office of the Secretary of State's May 12, 2023 privilege log. This motion is unopposed.

Pursuant to Paragraph 7(c) of the parties' Stipulated ESI Agreement, LUPE Plaintiffs' deadline to file a motion to compel in connection with the May 12, 2023 privilege log is Monday, June 12, 2023. *See* Dkt. 251. The parties are engaging in a meet-and-confer process regarding that privilege log, and the additional time will provide the parties an opportunity to narrow the scope of any disagreements. LUPE Plaintiffs do not seek an extension to delay these proceedings, and an extension will not prejudice State Defendants.

Accordingly, LUPE Plaintiffs respectfully request that their unopposed motion be granted, and that their deadline to file a motion to compel in connection with the Office of the Secretary of State's May 12, 2023 privilege log be extended to June 20, 2023.

Dated: June 7, 2023

/s/ Nina Perales

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/s/ Sean Morales-Doyle

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CERTIFICATE OF CONFERENCE

I hereby certify that, on June 5, 2023 and June 6, 2023, counsel for LUPE Plain	itiffs emailed
counsel for State Defendants, with all counsel copied, regarding the instant motion.	Counsel for
State Defendants indicated that they do not oppose the motion.	

/s/ Nina Perales
Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 7th day of June 2023.

/s/ Nina Perales
Nina Perales